

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON DIVISION

IN RE ETHICON, INC. PELVIC REPAIR  
SYSTEM PRODUCTS LIABILITY  
LITIGATION

CIVIL ACTION NO. 2:12-md-02327  
MDL No. 2327

----- Hon. Judge Joseph R. Goodwin

**This document applies to:**

Lisa Haefner v. Ethicon, Inc., et al.  
2:15-cv-0544

**PLAINTIFFS' RESPONSE TO DEFENDANTS' MOTION FOR ORDER  
REGARDING DISPOSITION OF NON-REVISION GYNECARE TVT  
PRODUCTS CASES**

NOW COMES the above-referenced Plaintiff, by and through the undersigned counsel, and in response to the motion of the Defendants, Ethicon, Inc. and Johnson & Johnson ("Ethicon") regarding the disposition of non-revision Gynecare TVT Products Cases (ECF Doc. 5313) set forth the following:

On March 2, 2018, Ethicon filed *Defendants' Motion for Order Regarding Disposition of Non-Revision Gynecare TVT Products Cases* (ECF Doc. 5313), which proposes a disposition of cases in which the plaintiff has not undergone a revision procedure. Accompanying the motion as Exhibit A is a list of cases that Ethicon maintains are cases in which the plaintiff has a Gynecare TVT product implanted and has had no revision procedure performed.

The above-named Plaintiff is included in Ethicon's list of plaintiffs who have not undergone a revision procedure. The above-named Plaintiff has in fact undergone a revision procedure and is not properly included in Ethicon's motion. Plaintiff's counsel has informed Ethicon that the above-named Plaintiff is not properly included in

Defendants' motion pertaining to non-revision cases. Plaintiff files this response to preserve their claims and avoid dismissal to the extent that Ethicon's motion is granted.

Respectfully submitted,

/s/Robert E. Price

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**CERTIFICATE OF SERVICE**

I hereby certify that on March 16, 2018, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this

MDL

Respectfully submitted,

/s/Robert E. Price

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